

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

RAJ KATARIA, HEENA BHANUSHALI, and
FIVE STAR CIGAR CORPORATION,

Plaintiffs,

v.

SYED BOKHARI, SHALINDER NICHANI,
AMIR WAQAR AHMED, MOHAMMAD
ILLAHI, and NORTHEASTERN WHOLESALE
ENTERPRISES, LLC,

Defendants, and,

FIVE STAR CIGAR CORPORATION,

Nominal Defendant.

Civil Action

No.

JURY TRIAL DEMANDED

AFFIDAVIT OF HEENA BHANUSHALI

I, Heena Bhanushali, being of full age and sound mind, hereby attest as follows:

1. I am a Plaintiff in the above-captioned case.
2. In the manner described below, I made five payments of \$100,000 each to purchase 20% ownership stakes in Five Star Cigar Corporation (“Five Star”) and Premium Cigars Depot Corporation on behalf of my brother, Plaintiff Raj Kataria.
3. On June 21, 2024, I made a wire transfer of \$100,000 to a Citizens Bank account held by Defendant entity Northeastern Wholesale Enterprises, LLC (“Northeastern”).
4. Also on June 21, 2024, I met Defendant Syed Bokhari at the Northeastern warehouse in Connecticut and gave him an additional \$100,000 in cash.
5. On August 26, 2024, I made a wire transfer of \$100,000 to a Citizens Bank account held by Northeastern.

6. I made these initial payments to Defendants Northeastern and Syed in reliance on Defendant Syed's misrepresentations that these funds would be used solely for the benefit of Five Star, but could not be deposited into a new Five Star account because deposits of this magnitude into a new account would raise "red flags" with the bank.

7. On October 28, 2024, I made a wire transfer of \$100,000 to a bank account held by Five Star.

8. On November 6, 2024, I made a wire transfer of \$100,000 to a bank account held by Five Star.

9. I subsequently learned that after I made these deposits Defendants immediately transferred funds from Five Star to Northeastern in the following amounts: \$185,000 on October 29, 2024, and \$210,000 on November 6, 2024.

10. The factual averments set forth in the Complaint that initiated the above-captioned litigation are true and correct to the best of my knowledge, information, and belief.

11. I certify that the foregoing statements are true to the best of my knowledge, information, and belief. I understand that if any of the foregoing statements are willfully false that I will be subject to penalties.

Attested By:


Heena Bhanushali

Sworn to and subscribed before me

This 4th day of March, 2025


Notary Public

Commonwealth of Pennsylvania - Notary Seal
PAMELA S MEYERSON - Notary Public
Philadelphia County
My Commission Expires April 4, 2028
Commission Number 1268726